

### REMARKS

Claims 1-13 are pending in the present application. Claim 1 was amended in this response. Claims 14-16 were canceled, without prejudice. No new matter has been introduced. Favorable reconsideration is respectfully requested.

Claims 1, 2, 4, 6 and 13 were rejected under 35 U.S.C. §102(e) as being anticipated by *Wille* (US Patents 6,047,058; 6,320,954; and 6,430,283). Applicant respectfully traverses this rejection. Applicants request clarification regarding this rejection, as the rejection states: “*Wille* teaches a communication system of at least two private branch exchanges having a team function controller, which enable users to communicate with each other in (see disclosure).” After reviewing the rejection in its entirety, Applicant cannot find what elements in claim 1 this is supposed to relate to. The claim recites an interrelation of real and imaginary instances, as well as associating process instances, while *Wille* makes no mention whatsoever of these specific features. Furthermore, the Office Action has provided no guidance with regard to specific portions of the documents that the Examiner found relevant (other than the Abstract, which, again, is silent regarding the features of claim 1). Applicant submits that this type of Examination is improper. Withdrawal of the rejection is respectfully requested.

Claims 1, 2 and 6 were rejected under 35 U.S.C. §102(b) as being anticipated by *Karppinen* (U.S. Patent No. 5,920,619). Claims 3, 5 and 7-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Karppinen* (U.S. Patent No. 5,920,619) or *Wille* (US Patents 6,047,058; 6,320,954; and 6,430,283). Applicant traverses these rejections. Favorable reconsideration is respectfully requested.

The disclosure in *Karppinen* is specifically directed to a hierarchically arranged system of exchanges, organized in centrex groups (see FIG. 1; col. 4, lines 42-48). Each exchange is configured differently (not equivalently) and are assigned different tasks according to their hierarchical level (local exchange/regional exchange) (col. 4, line 61 – col. 5, line 49). Furthermore, *Karppinen* fails to teach an instance of each subscriber (real or imaginary) in each exchange. Accordingly, it is respectfully submitted that the rejection under 35 U.S.C. §102(b) is improper and should be withdrawn.

Claim 1 was also rejected under 35 U.S.C. §102(e) as being anticipated by *Siegmund et al.* (U.S. Patent No. 6,181,789). Applicant traverses this rejection. Favorable reconsideration is respectfully requested

*Siegmund* discloses a telecommunication system utilizing virtual private networks via a single switch 5 (i.e. telecommunication device) (FIG. 1, col. 5, lines 46-66). In contrast, the presently amended claims recite a plurality of mutually connected telecommunications devices. While it appears that the Office Action is equating "telecommunication device" with "subscriber," the recitations of these elements show they are different elements, and that equating them would be improper under the most reasonable broad interpretation possible. Accordingly, the rejection under 35 U.S.C. §102(e) is improper and should be withdrawn.

In light of the above, Applicants respectfully submit that claims 1-13, are both novel and non-obvious over the art of record. Accordingly, Applicants respectfully request that a timely Notice of Allowance be issued in this case. If any additional fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 02-1818. If such a deduction is made, please indicate the attorney docket no. (0112740-366) on the account statement.

Respectfully submitted,

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